



7. Deny the allegations of paragraph 7 except admit that the IMDB Website provides information on persons in the film industry, and respectfully refer the Court to the IMDB Website for the complete contents thereof.

8. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8.

9. Deny the allegations of paragraph 9 except admit that IMDB Website contains a separate function that allows actors and crew members to post their resumes and/or photos, for a fee, on a dedicated area of the IMDB Website, and otherwise respectfully refer the Court to the IMDB Website for the complete contents thereof.

10. Admit the allegations of paragraph 10, and respectfully refer the Court to the IMDB Website for the complete contents thereof.

11. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 11.

12. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 12.

13. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 13.

14. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 14.

15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 15.

16. Deny the allegations of paragraph 16 except admit that information concerning Blue can be found on the IMDB Website, and respectfully refer the Court to the IMDB Website for the complete contents thereof.

17. Deny the allegations of paragraph 17.

18. Deny the allegations of paragraph 18 and state that the IMDB Website does not currently credit plaintiff as Director of “Dreams of Candace Hart (1991)” or “Fantasy in Blue (1991).”

19. Deny the allegations of paragraph 19 and state that the IMDB Website does not currently attribute plaintiff as “Nesya and/or Nancy Shapiro” as part of “Dreams of Candace Hart.”

20. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 20.

21. Deny the allegations of paragraph 21.

22. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 22.

23. Deny the allegations of paragraph 23.

24. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 24.

25. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 25.

26. Deny the allegations of paragraph 26.

27. Deny the allegations of paragraph 27.

28. Deny the allegations of paragraph 28.

29. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 29.

30. Deny the allegations of paragraph 30.

31. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 31.

32. Deny the allegations of paragraph 32.

33. Repeat their responses to paragraphs 1 through 32 of the Complaint.

34. Deny the allegations of paragraph 34.

35. Deny the allegations of paragraph 35.

36. Deny the allegations of paragraph 36.

37. Deny knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 37.

38. Deny the allegations of paragraph 38.

39. State that paragraph 39 contains statements to which no response is required, except admit that Plaintiff purports to seek permanent injunctive relief.

40. Repeat their responses to paragraphs 1 through 39 of the Complaint.

41. Deny the allegations of paragraph 41.

42. Deny the allegations of paragraph 42.

43. Deny the allegations of paragraph 43.

44. Deny the allegations of paragraph 44.

45. Repeat their responses to paragraphs 1 through 44 of the Complaint.

46. Deny the allegations of paragraph 46.

47. State that paragraph 47 contains statements to which no response is required, except admit that Plaintiff purports to seek damages and permanent injunctive relief.

48. Repeat their responses to paragraphs 1 through 47 of the Complaint.

49. Deny the allegations of paragraph 49.

50. Deny the allegations of paragraph 50.

51. Deny the allegations of paragraph 51.

52. Deny the allegations of paragraph 52.

**First Affirmative Defense**

53. The Complaint fails to state a claim upon which relief can be granted.

**Second Affirmative Defense**

54. Plaintiff's claims are barred by 47 U.S.C. § 230.

**Third Affirmative Defense**

55. If Defendants violated any rights of Plaintiff (which they expressly deny), they did so innocently and/or without the necessary scienter.

**Fourth Affirmative Defense**

56. The claims asserted in the Complaint are barred, in whole or in part, by the doctrines of laches, estoppel, unclean hands, and/or waiver.

**Fifth Affirmative Defense**

57. The claims asserted in the Complaint are barred, in whole or in part, by the applicable statutes of limitation.

**Sixth Affirmative Defense**

58. Plaintiff has failed to allege damages with the requisite specificity.

**Seventh Affirmative Defense**

59. Any damages suffered by plaintiff must be diminished on account of culpable conduct by plaintiff or those acting on plaintiff's behalf.

**Eighth Affirmative Defense**

60. Plaintiff failed to mitigate her damages, if any.

WHEREFORE, Defendants request that judgment be entered:

- (A) Dismissing the Complaint in its entirety, with prejudice;
- (B) Awarding Defendants the costs and disbursements of this action; and
- (C) Awarding Defendants such other and further relief as the Court deems just

and proper.

Dated: New York, New York  
September 12, 2007

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